

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

USA,)	
Plaintiff,)	
)	CASE NO. 15 CR 10145-RGS
v.)	
)	
)	
BRANDI WILLIAMS,)	
Defendant)	

UNOPPOSED MOTION FOR *R.I.S.E* HEARING

NOW COMES Defendant, Brandi Williams, through counsel, and hereby moves this Honorable Court to schedule a hearing regarding the Defendant's admission to the *R.I.S.E. Program*. ("R"epair "I"nvest "S"ucceed "E"merge Program). In support thereof, counsel states the following:

1. The Probation Department has prescreened the Defendant as a potential candidate for the *R.I.S.E.* Program.
2. The Defendant is amenable to acceptance into the *R.I.S.E.* Program and has executed all necessary documents.
3. The Government, through its representative AUSA Emily Cummings has indicated that they do not object to the instant motion.
4. Given the infancy of the *R.I.S.E* Program itself, a hearing is requested to discuss the procedural issues attendant to the Defendant's admission into the program including, but not limited to (a) the taking of a deferred Rule 11 plea by the Court, (b) the impact of a plea on the Defendant's release, and (c) the Defendant's ability, if any, to vacate said plea or appeal a sentence.

WHEREFORE, the Defendant urges the Court to schedule a hearing on the instant motion for November 10, 2015.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "P.C. Horstmann".

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CERTIFICATE OF SERVICE

I, Peter Charles Horstmann, Esquire, hereby certify that on this 19th day of October, 2015, a copy of the foregoing was electronically served upon Assistant United States Attorney Emily Cummings, Office of the United States Attorney, One Courthouse Way, Boston, Massachusetts, 02210

A handwritten signature in blue ink, appearing to read "P.C. Horstmann".

Peter Charles Horstmann, Esquire